

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Steven Mendoza,)	
)	
)	
)	
<i>Plaintiff,</i>)	
)	
)	
-vs-)	No. 20 C 670
)	
Thomas Dart, Sheriff of Cook)	Judge Bucklo
County, et. al.,)	
)	Magistrate Judge McShain
<i>Defendants.</i>)	

PLAINTIFF'S RULE 30(b)(6) NOTICE

Defendant Cook County is hereby notified and requested pursuant to Rule 30(b)(6) of the Federal Rule of Civil Procedure to identify and designate an individual or individuals to be deposed in regard to the following matters on or before July 9, 2021, over Zoom that will be recorded by stenography:

1. In 2017, a plan was submitted to the County Board for “Renovation of Branch Courts” that was approved by the County Board in 2017 with a budget of \$4.55 million. See Walker CCSAO 000876. Under the “NOTES” column, it states “ADA Compliance; change to 1.” The description of this project states “improve security and conditions.” *Id.* Produce a designee to discuss the following topics:
 - a. Documents presented to the County Board pertaining to this project title;
 - b. The amount of money set aside for this project, including the specific money allocated for the project at 111st Street;
 - c. Scope of the “Renovation of Branch Courts,” including the Branch Courts at 111th Street;

- d. Explain whether any Business Cases were prepared pertaining to the “Renovation of Branch Courts,” including the Branch Courts at 111th Street;
 - e. A status of the project titled “Renovation of Branch Courts,” including the Branch Courts at 111th Street.
2. Officer Sapp was deposed on June 2, 2021, and explained that the public and security staff have access to ADA compliant bathrooms at the 111th Street Courthouse. Explain:
 - a. The month and year when the security staff bathroom was made ADA compliant;
 - b. Explain why the security staff bathroom was renovated to be ADA compliant;
 - c. The month and year when the public bathrooms were made ADA compliant;
3. From January 1, 2015, to the present action taken to make the 111th Street Courthouse accessible for wheelchair-using detainees remanded to the Sheriff’s custody.
4. A document titled “Cook County Bureau of Asset Management; Department of Capital Planning & Policy” marked Walker CCSAO 000841-000848 identifies a project titled “Branch Courthouse 35/38 111th Location Renovations (Trad).” Explain:
 - a. The origins for this project;
 - b. The scope of this project;
 - c. Documents generated for this project including the Design RFP;
 - d. The status of this project;
 - e. Funds allocated by the County Board for this project;
 - f. The Business Cases, if any, submitted pertaining to this project;
 - g. Anticipated completion of this project;

/s/ Patrick W. Morrissey
Thomas G. Morrissey, Ltd.
10150 S. Western Ave., Rear Suite
Chicago, IL 60643
(773)233-7900
pwm@morrisseylawchicago.com

CERTIFICATE OF SERVICE

I, Patrick W. Morrissey, state that I served the foregoing on the undersigned attorneys for defendants by Email on June 14, 2021.

Rachel Wilson
Michael Czopkiewicz
Assistant State's Attorney
Civil Rights/Torts Litigation
500 Richard J. Daley Center
Chicago, IL 60602

Miguel Larios
Assistant State's Attorney
Richard J. Daley Center
Chicago, IL 60602



Patrick W. Morrissey
Thomas G. Morrissey, Ltd.
10150 S. Western Ave., Suite Rear
Chicago, IL 60643
(773)-233-7900